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July 28, 2025

VIA ECF

Honorable Jed S. Rakoff
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Rivers v. Combs, et al.*
Dkt. No. 25-cv-1726-JSR

Dear Judge Rakoff:

I represent defendant Harve Pierre in the referenced matter. By this letter, Mr. Pierre joins certain codefendants' motions to dismiss the Complaint

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with prejudice, adopting their arguments concerning the untimeliness of Plaintiff's claims¹ and the deficiencies in her factual pleadings.²

Pierre-specific briefing on these issues would be redundant. Despite its Homeric proportions, the factual portion of the Complaint barely mentions Mr. Pierre and sheds no light on the viability of the various causes of action against him.³ Plaintiff alleges, in sum and substance, that:

- Mr. Pierre served as President of Bad Boy Entertainment and Bad Boy Records “[a]t all times relevant” (Compl. ¶¶ 34-35);
- He appeared in several episodes the MTV reality series, *Making the Band 2*, which aired between 2002 and 2004 (*Id.* at ¶¶ 86, 83, 154, 215, 302); and
- In the first episode of the series, he selected Plaintiff and several other vocalists for a televised audition before Defendant Combs (*Id.* at ¶ 532).

There is no allegation that Mr. Pierre ever interacted with Plaintiff off-camera, entered with her into an agreement of any sort or exerted any level of influence over her career in music.

¹ See Production Defendants’ Memorandum in Support of the Motion to Dismiss (“Production Defendants’ Memo”), ECF No. 131, ARGUMENT POINT B.; Memorandum in Support of Defendant UMG Recordings Inc.’s Motion to Dismiss the Complaint (“UMGR Memo”), ECF No. 133, ARGUMENT POINT I.a., e.-j.; Memorandum in Support of the Combs Defendants’ Motion to Dismiss the Complaint (“Combs Memo”), ECF No. 139, ARGUMENT POINT II.

² See Production Defendants’ Memo at ARGUMENT POINT C.1., 3., 6.-7., 9.-11.; UMGR Memo at ARGUMENT POINT II., III.a., e.-i.; Combs Memo at POINT III., IV., VI., X., XI., XIII., XIV.

³ In addition to a statutory cause of action under RICO (COA 1), the Complaint purports to assert common law claims against Mr. Pierre for breach of an implied covenant of good faith and fair dealing (COA 11), fraud (COA 12), negligence (COA 14) and negligent infliction of emotional distress (COA 15).

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The extraneity of the Complaint's factual allegations leaves Mr. Pierre in much the same position as his codefendants: he faces a litany of claims that are time-barred, legally defective and facially implausible. These defects are thoroughly exposed in the trio of dismissal motions that have already been filed in this action.

We thank the Court for its consideration of this matter and look forward to the oral argument scheduled for August 13.

Respectfully submitted,



Scott Leemon

cc: All counsel (via ECF)